

# Exhibit A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

HUANG ZHIYANG,

Plaintiff,

v.

45.COM, an Internet domain name, and  
JOHN DOE,

Defendants.

Civil Action No. 1:20-cv-836-LO-IDD

**DECLARATION OF DAVID E. WESLOW**

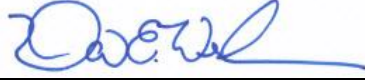
I, David E. Weslow, hereby declare as follows:

1. I am an attorney with the law firm Wiley Rein LLP, counsel for Plaintiff, and am a member in good standing of the State Bars of Maryland and the District of Columbia.
2. I submit this Declaration in support of the Motion for Withdrawal of the Appearance of Wiley Rein LLP as Counsel for Plaintiff based on my personal knowledge.
3. Pursuant to Rule 1.16(b) of the Virginia Rules of Professional Conduct, Wiley Rein LLP has sufficient grounds to withdraw from this representation.
4. Pursuant to Rule 1.6(a) of the Virginia Rules of Professional Conduct, Wiley Rein LLP is unable to set forth the detailed factual basis for the requested withdrawal in this filing.
5. Without waiver of any privilege or protection, Plaintiff is aware of Wiley Rein LLP's intention to withdraw from the representation pursuant to Rule 1.6(d) of the Virginia Rules of Professional Conduct and Local Civil Rule 83.1(g), as well as the evidentiary hearing that is presently scheduled for June 21, 2021.

6. Plaintiff communicates via the email address [whoisprotecte@gmail.com](mailto:whoisprotecte@gmail.com), and I can confirm that Plaintiff may be contacted via this address.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 4, 2021 in Arlington, VA.



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